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TEXAS INSTRUMENTS

SDMS DocID 2096213

August 6, 2007

VIA EMAIL AND CERTIFIED MAIL NO. 7003 3110 0005 7803 3427

Ms. Joan Martin-Banks
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: CERCLA 104(e) Request for Information
Chem Fab Corporation Site, Doylestown, Bucks County, Pennsylvania (the "Site")

Dear Ms. Banks:

Enclosed please find Texas Instruments Incorporated's ("TI") response to EPA Region III's CERCLA 104(e) request for information for the Site. Please note that by letter dated June 19, 2007 from Ms. Leigh Rendé to Ms. Courtney Riley of TI, EPA Region III granted TI an extension to respond until August 6, 2007. In addition, as more fully described in the enclosed response, you and Ms. Riley agreed to some further clarifications to the scope of the responses. TI's response is made pursuant to those clarifications.

We ask that you please direct all further agency communications to:

Ms. Courtney Riley
Senior Counsel
Texas Instruments Incorporated
7839 Churchill Way, MS 3999
Dallas, Texas 75251
courtney.riley@ti.com
972-917-4137

Also, please feel free to contact her directly should you have any questions about the enclosed response.

Sincerely,

Patrick J. Webb
Environmental Specialist

Enclosure

cc: w/enclosure: Courtney Riley (TI Law Department)

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TEXAS INSTRUMENTS INCORPORATED
RESPONSE TO EPA'S INFORMATION REQUEST
CHEM FAB CORPORATION

To: "Request for Information Pursuant to Section 104 of CERCLA for the Chem Fab Corporation Site"
Dated June 13, 2007

Agreed Clarifications: By telephone conference on July 2, 2007 between Courtney Riley, Senior Counsel, Texas Instruments Incorporated, and EPA Region III Civil Investigator, Joan Martin-Banks, and follow-up email confirmations, EPA and TI agreed to limit the scope of the Questions and Answers herein as follows:

1) for questions that span a time period, TI may respond to the time period of 1973 to 1995
2) TI will focus the responses on its Attleboro, Massachusetts operations, formerly located at 34 Forest Street, Attleboro, Massachusetts (the "Attleboro facility").

RESPONSES

General objections: The Respondent, Texas Instruments Incorporated ("TI"), objects to the Request for Information (the "Request") to the extent the Request or the definitions require Respondent to produce information or documents or create responses containing information that are not required to be produced pursuant to Section 104(e) of CERCLA or other applicable law. In particular, Respondent objects that some of the questions and definitions are unduly burdensome and onerous to the extent they ask Respondent to create responses that contain information not relevant to the Chem Fab Site or generation of waste that could be present at the Chem Fab Site. In addition, Respondent objects to the extent the Request can be construed as asking for disclosure of privileged information or as requesting information of a kind and/or in a form not authorized by applicable law. Respondent TI claims any applicable privilege and objects to the Request. Any inadvertent production of privileged material is not intended as a waiver of the applicable privilege.

Please note that submission of this response and accompanying documents is not intended, and should not be construed, as an acknowledgment or admission of any responsibility, or liability of TI, its officers, directors, employees, agents or representatives, regarding the Chem Fab Site or any other site, or as a waiver of any rights, privileges or defenses with respect thereto. TI reserves the right to object to the use, in whole or in part, of any document or information submitted herewith in any proceeding for any purpose.

Subject to the above Agreed Clarifications and objections and without waiving any objections including those stated above and below, TI responds as follows:

Question 1. What is the current nature of your business or activity? What was the nature of your business or activity during the period 1965 to 1999? Please describe in detail if the nature of your business or activity changed from the period 1965 to 1999. Please provide a detailed explanation of these changes.

Response to Question 1:

Current nature of business at the Attleboro, Massachusetts facility:

On April 27, 2006, TI sold its business division known as Sensors and Controls, which formerly operated at the Attleboro facility, to S&C Purchase Corp. This was an asset and stock transaction with TI retaining liability for historic environmental matters related to the Attleboro facility. As of that date, TI no longer performed any business or manufacturing operations at the Attleboro facility and does not perform business or manufacturing operations at that facility today.

TI Attleboro facility from the period of 1973 to 1995:

Generally, TI operated three manufacturing businesses at the Attleboro facility. The Materials business produced specialty clad metals for numerous applications including: automotive trim, truck bumpers,

thermostatic metals, coinage, pots & pans, pen caps, and electrical contacts, etc. The Controls business produced numerous products including: motor protectors, light ballasts, HVAC compressor controls, pressure sensors, circuit breakers, etc. In addition, from approximately 1973 to 1998 TI also had a small semiconductor support manufacturing operation at the Attleboro facility. This operation produced leadframes for TI's semiconductor products.

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Other than standard business fluctuations and evolution of sensors and controls products and technology, the nature of our operations did not change to any substantial degree during the relevant time period.

Question 2. EPA has obtained information during the course of its investigation indicating that you may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding all wastes and by-products produced by you during the period 1965 to 1999:

a. The nature of each "waste" (as the term "waste" is defined in paragraph 6 of the definitions attached hereto) used including its chemical content, characteristics and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers, scrap metal). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1965 through 1999, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;

TI objects to this question and its subparts as overly broad and unduly burdensome in that it requests information for an extensive period of time and not relevant to the Chem Fab site. Such information is beyond the scope of CERCLA 104(e). Subject to the foregoing objections TI provides the following information:

Response to Question 2a:

TI Attleboro produced the general categories of wastes listed in Table 1. Chemical analysis information is not available. MSDS's were not generated for waste products.

TABLE 1

Wastes Generated at Texas Instruments Attleboro, MA Facility

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Waste	Generating Process or Business	Nature/Process	Physical State	Average Annual Quantity	Units/Container	Disposal
Acid filters	All	Filters from wet acid processes	solid	29	55 gallon drum	Transported for off-site disposal
Acid rags	Materials	Absorbent materials used in wet acid process	solid	4	55 gallon drum	Transported for off-site disposal
Acid sludge	Controls & Semiconductor	Plating processes	solid	23	55 gallon drum	Transported for off-site disposal
Aluminum Oxide	Materials	Blast cleaning operation	solid	13	55 gallon drum	Transported for off-site disposal
Ammonium persulfate	Controls & Semiconductor	Plating processes	liquid	9	55 gallon drum	Transported for off-site disposal
Antifreeze	Facility Maintenance	Facility and vehicle maintenance	liquid	5	55 gallon drum	Transported for off-site disposal
Asbestos	Facility Maintenance	From building materials	solid	13	55 gallon drum	Transported for off-site disposal
Barium	Controls	Scrap material from manufacturing	solid	40	1 cubic yard flex bin	Transported for off-site disposal
Cadmium	All	Plating processes and silver melt operation	solid	15	55 gallon drum	Transported for off-site disposal
Caustic	Controls & Semiconductor	Cleaning processes	liquid	117	55 gallon drum	Transported for off-site disposal
Chlorinated solvents	All	Solvents from cleaning processes	liquid	250	55 gallon drum	Transported for off-site disposal
Construction Debris	All	Miscellaneous non-hazardous material from various construction activity	liquid	9	55 gallon drum	Transported for off-site disposal
Ferric Chloride	Semiconductor	Waste plating solution	liquid	39429	Gallons (tanker truck)	Transported for off-site disposal
Flammable liquid	All	Testing and cleaning processes	liquid	14	55 gallon drum	Transported for off-site disposal
Flammable solid	All	Testing and cleaning processes	solid	26	55 gallon drum	Transported for off-site disposal
Freon	All	General cleaning operations	liquid	16	55 gallon drum	Transported for off-site disposal
Lead debris	Controls	Scrap material from manufacturing	solid	5	55 gallon drum	Transported for off-site disposal
Medical	Medical	Miscellaneous medical office wastes	solid	381	Pounds (fiber drum)	Transported for off-site disposal
Mercury	Controls	Scrap material from manufacturing	solid	503	Pounds (metal drum)	Transported for off-site disposal
Ni filters	Controls & Semiconductor	Plating processes	solid	2	55 gallon drum	Transported for off-site disposal
Oil debris	All	Maintenance processes	solid	49	1 cubic yard flex bin	Transported for off-site disposal
Oil filters	All	Maintenance processes	solid	41	55 gallon drum	Transported for off-site disposal
Oil, oil & water	All	Waste hydraulic and machinery lubricating oils	liquid	543	55 gallon drum	Transported for off-site disposal
Oil sludge & debris	All	Absorbent materials used in oil related maintenance activities	solid	241	55 gallon drum	Transported for off-site disposal
PCB	Facility Maintenance	Light ballasts	liquid	2	55 gallon drum	Transported for off-site disposal
Photo resist	Semiconductor	Waste etch solution	liquid	10	55 gallon drum	Transported for off-site disposal
Rotoclone	Controls	Non hazardous dust collection	solid	6	55 gallon drum	Transported for off-site disposal
Rustlick	Facility Maintenance	Grinding coolant	liquid	90	55 gallon drum	Transported for off-site disposal
Silica Carbide &water	Controls	Scrap material from manufacturing	liquid	9	55 gallon drum	Transported for off-site disposal
Soap powder	Materials	Powder lubricant for wire bonding	solid	35	55 gallon drum	Transported for off-site disposal
Solvent debris	All	From cleaning processes	solid	13	55 gallon drum	Transported for off-site disposal
Trichloroethene debris	All	Absorbent material used in solvent cleaning and maintenance activities	solid	22	55 gallon drum	Transported for off-site disposal
Waste water	All	Manufacturing wash and rinse water	liquid	unknown	None	On-site treatment
Zinc filters	Controls & Semiconductor	From plating processes	solid	1	55 gallon drum	Transported for off-site disposal

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b. The annual quantity of each "waste" used or generated;

Response to Question 2b: Table 1 provides approximate annual generation quantities.

c. The process(es) in which each "waste" was used or the process(es) that generated each;

Response to Question 2c: Table 1 provides processes that generated each waste.

d. The types of containers used to treat, store or dispose of each "waste"; and,

Response to Question 2d: Table 1 provides container information for each waste.

e. The method of treatment and/or disposal or each "waste."

Response to Question 2e: Table 1 provides treatment and/or disposal information for each waste.

Question 3. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including your own, who during the period 1965 to 1999, may have:

a. Disposed of or treated "waste" at the Site;

Response to Question 3a: TI has not identified any information responsive to this Request.

b. Arranged for the disposal or treatment of "waste" at the Site; or

Response to Question 3b: TI has not identified any information responsive to this Request.

c. Arranged for the transportation of "waste" to the Site (either directly or through transshipment points) for disposal or treatment.

Response to Question 3c: TI has not identified any information responsive to this Request.

Question 4. Describe the methods used by you to dispose of and/or treat "waste" during the period 1965 to 1999.

Response to Question 4: TI objects to this question and its subparts as overly broad and unduly burdensome in that it requests information for an extensive period of time and not relevant to the Chem Fab site. Such information is beyond the scope of CERCLA 104(e). Subject to the foregoing objections TI provides the following information:

Table 1 provides treatment and/or disposal information for each waste.

Question 5. If your response to Question 4 includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain the arrangements for those transactions and provide documentation that confirms the nature of those transactions.

Response to Question 5: TI objects to this question as overly broad and unduly burdensome in that it requests information for an extensive period of time and not relevant to the Chem Fab site.

Such information is beyond the scope of CERCLA 104(e). Subject to the foregoing objections TI provides that during the period of 1973-1995 TI Attleboro contracted with a number of appropriately licensed and authorized transporters to transport and/or dispose of wastes. Please see the Response to Question No. 6.

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Question 6. **Did you make arrangements with any of the following companies or individuals to transport and/or dispose of wastes? Manfred De Rewal, Echo Corporation, Revere Chemical Company, Revere Chemical Transportation, De Rewal Chemical Company, Inc., Boarhead Corporation, East Falls Corporation ("AETC"), the Envirotech Company, Environmental Chemical Control, Inc., Jonas Waste Removal, Marvin Jonas, Inc., Marvin Jonas, Simon Wrecking, Simon Resources Inc., Sam Simon, Chem Fab Corporation, Hans Richard Becker, Gulbrandsen Co., Chemical Leaman Tank Lines, Inc., Coastal Tank Lines Inc., Macs Associates, and Matlack Transportation Co.**

If so, identify:

a. **The persons with whom you, or such other persons, made such arrangements;**

Response to Question 6a: TI utilized Gulbrandsen Co. for disposal of Ferric Chloride waste. Most arrangements were coordinated with Peter Gulbrandsen, President of Gulbrandsen Co. No other companies or individuals listed have been identified as being used by TI.

b. **Every date on which such arrangements took place;**

Response to Question 6b: Generally Gulbrandsen shipments occurred weekly from 1973 to 1998.

c. **For each transaction, the nature and quantity of the "waste: including the chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;**

Response to Question 6c: Each shipment was a tanker truck of approximately 3500 – 4000 gallons. Please refer to Table 1 for additional information on the Ferric Chloride waste.

d. **Precise locations at which each "waste" was disposed or treated;**

Response to Question 6d: Gulbrandsen Co. transported TI's Ferric Chloride waste to permitted facilities. located in York, Pennsylvania (Envirite Inc) or to Model City, New York.

e. **The persons who selected the Site as the place at which "waste" was disposed or treated;**

Response to Question 6e: TI has not identified any information responsive to this Request.

f. **The final disposition of each of the "waste" involved in such transactions; and**

Response to Question 6f: TI has not identified any information responsive to this Request.

g. **The names of employees, officers, owners and agents for each transporter.**

Response to Question 6g: See response to 6(a).

Question 7. **For each and every instance in which you arranged for disposal or treatment of "waste" at the Site, identify:**

a. **The characteristics, physical state (i.e., liquid, solid) and chemical composition of each "waste";**

Response to Question 7a: TI has not identified any information responsive to this Request.

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b. The persons who supplied you with "waste" material disposed or otherwise handled by you;

Response to Question 7b: TI has not identified any information responsive to this Request.

c. How such "waste" were used, treated, transported, disposed or otherwise handled by you;

Response to Question 7c: TI has not identified any information responsive to this Request.

d. When and where such "wastes" were used, treated, transported, disposed or otherwise handled by you;

Response to Question 7d: TI has not identified any information responsive to this Request.

e. The quantity (number of loads, gallons, drums) of the "wastes" which were used, treated, transported, disposed or otherwise handled by you; and

Response to Question 7e: TI has not identified any information responsive to this Request.

f. Any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with you to generate, treat, store, transport or dispose of "wastes" at the Site.

Response to Question 7f: TI has not identified any information responsive to this Request.

Question 8. Provide the names, titles and areas of responsibility of any persons, including all present and former employees, who may be knowledgeable of your waste disposal practices, whether or not involving disposal at the Site, during the period 1965 to 1999. Include current addresses and dates of birth for former employees.

Response to Question 8: For the period of 1973 to 1995 persons who may have knowledge of waste disposal practices at TI's Attleboro facility include:

Pat Webb-see contact information below
Don Abbot-see contact information below

Mike Elliott-former employee; see contact information below
Frank Veale-former employee; see contact information below
Rick Derby-former employee; see contact information below
Ray Lizotte- former employee-not available
Jim Armstrong-former employee- not available
Pete Tortolano- former employee- not available
Jimmy Chandler-former employee- not available
Robert Mossman-former employee- not available
Robert Sorgel-former employee- not available
Hank DeSantis-former employee- not available
Lou Landry-former employee- not available
Frank Barrett-former employee- not available
Don Mikutel-former employee- not available
Bob Murphy-former employee- not available

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Question 9. Describe any permit applications and any correspondence between you and any regulatory agencies regarding "wastes" transported to or disposed of at the Site.

Response to Question 9: Other than this Request, TI has not identified any information responsive to this Request.

Question 10. Provide copies of any correspondence between you and any third part regarding "wastes" transported to or disposed of at the Site.

Response to Question 10: TI has not identified any information responsive to this Request.

Question 11. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal or transportation of such "wastes" to the Site.

Response to Question 11: TI has not identified any information responsive to this Request.

Question 12. Provide the identities of all predecessors in interest who, during the period 1965 to 1999, transported, stored, treated or otherwise disposed of any "wastes" at the Site and describe in detail the nature of your predecessor in interest's business. Describe all changes in ownership from 1965 to the present, including the date of the ownership change and identify the type of change (i.e., asset purchase, corporate merger, consolidation, and name change). Provide a copy of each asset purchase and merger agreement.

Response to Question 12: Please see TI's response to Question 1.

Question 13. Provide the name, title, address, and telephone number of the person answering these questions of behalf of the respondent.

Response to Question 13:

Pat Webb
Environmental Specialist
Texas Instruments Incorporated
13588 N. Central Expressway
Dallas, TX 75243
972-927-9004

Question 14. For each question provide the name, title, area of responsibility, current address and telephone number for all persons consulted in the preparation of the answers.

Response to Question 14:

Courtney J. Riley
Senior Counsel
Texas Instruments Incorporated
7839 Churchill Way, MS 3999
Dallas, Texas 75251
972-917-4137

Mike Elliott (former TI employee)
Environmental, Safety & Health Manager
Sensata Technologies, Inc.

529 Pleasant Street
Attleboro, MA 02703
(508) 236-1809

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Frank Veale (former TI employee)
Environmental, Safety & Health Director
Sensata Technologies, Inc.
529 Pleasant Street
Attleboro, MA 02703
(508) 236-1804

John Willis
Environmental Specialist
Texas Instruments Incorporated
13588 N. Central Expressway
Dallas, TX 75243
972-927-9004

Rick Derby
Waste Operations Manager
NewStream LLC
527 Pleasant Street
Building 11-D
Attleboro, MA 02703
(508) 236-6001

Don Abbott
Manufacturing Manager, Lead Frames
Texas Instruments Incorporated
529 Pleasant Street
Attleboro, MA 02703
(508) 236-1569

Question 15. If you have reason to believe that there may be persons able to provide more detailed or complete responses to any questions contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons and describe the additional information or documents they may have.

Response to Question 15: TI has no further information responsive to this Request.

Question 16. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained.

Response to Question 16: TI has not identified any information responsive to this Request.

Question 17. If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to or release of contamination at the Site, please provide such information. The information you provide in response to this request should include each party's name, address, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response to Question 17: TI has not identified any information responsive to this Request.